

PTO/SB/33 (07-05)

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Attorney Docket Number 14950US01

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| In re Application of: |) | |
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REQUEST FOR PRE-APPEAL BRIEF REVIEW

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

This amendment is filed in response to the Office Action
mailed 7/25/2008.

REMARKS

Claims 1-23 are presently pending and stand rejected. Assignee respectfully requests pre-appeal brief review of the rejections.

Claims 1 and 7 were rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Ozcelik in view of Uz. Claim 1 recites, among other limitations, "writing a second portion of the progressive frame while displaying the first portion of the progressive frame". Claim 7 recites, among other limitations, "a controller for writing a second portion of the progressive frame in the memory, while the display engine displays the first portion".

Examiner has indicated that Ozcelik discloses:

writing a second portion of the frame while displaying the first portion of the frame (col. 12, ln. 19-41); Ozcelik discloses the second portion, ie. bottom field, of the frame is written or buffered for storage while the first portion, ie. top field, is displayed). Ozcelik does not specifically disclose 'progressive frames'. However, Uz teaches the displaying of progressive frames (col. 4, ln.29-43; Uz discloses the decoding and displaying of progressive frames). Therefore, it would have been obvious to one of ordinary skill in the art to combine the teachings of Ozcelik and Uz, as a whole, for efficiently displaying high quality progressive video images while reducing noise...

Office Action at 5-6; see also Office Action at 9.

Assignee respectfully traverses the rejection. If the *progressive images* of Uz were used, it would not be possible for "*bottom field* of the frame is written or

buffered for storage while the first portion, ie. *top field*, is displayed". Since the lines of a progressive images are drawn sequentially, it is not possible that the odd-numbered lines, ie., the bottom field of the frame is written or buffered for storage while the even-numbered lines, ie., *top field*, is displayed.

Accordingly, Assignee respectfully submits that Ozcelik and Uz cannot be combined as proposed by Examiner, teach away from each other, and are inoperable. Accordingly, Assignee respectfully requests that the rejections to claims 1 and 7, and dependent claims 2-6 and 8-14 be reversed.

Claim 13 recites, among other limitations, "no more than 4 megabytes" and "at least 1280x720 resolution". Claim 14 recites, among other limitations, "no more than 8 megabytes", "frame comprises high definition television progressive frames with at least 1920x1080 resolution."

Examiner has indicated that Ozcelik discloses "frames are stored in buffers no more than the seize of 4 megabytes (col. 4, ln. 55-57, note 3X or approximately 3 megabyte is needed for buffering the frame data". Office Action at 11. Examiner has also indicated that "Ozcelik and Uz do not specifically discloses the use of high definition television frames with at least" "1280x720 resolution", "1920x1080". OA at 11; 12. "However, Luna teaches the use of high definition television frames with at least" "1280x720 resolution" "1920x1080". OA at 12. "It would have been obvious to ... use well known term of 'high definition television' ... for viewing clear images for viewing in high definition monitors and televisions so as to enjoy enhanced

quality images when watching movies and televised programming." OA at 12.

Assignee respectfully traverses because if Ozcelik and Uz were modified to use high definition television, it would no longer be the case that "3 megabytes is needed for buffering the frame data". It is noted that Ozcelik uses standard NTSC size frames of 720x480 pixels. See Col. 4, Line 41. Clearly when higher resolution frames are used, e.g., 1280x720, or 1920x1080, more memory is required.

Claim 18 was rejected under 35 U.S.C. § 102(b) as anticipated by Ozcelik. Claim 18 recites, among other limitations, "a controller for writing a second portion of the field in the memory, while the display engine displays the first portion of the field". Examiner has indicated that Ozcelik discloses "the second portion, ie, bottom field of the frame is written or buffered while the first portion, ie. top field is displayed." Office Action at 2-3.

Assignee respectfully traverses the rejection. It is noted that claim 18 recites, "second portion of *the field*" and "first portion of *the field*", i.e., the "first portion of the field" and the "second portion of the field" claim antecedent basis to the same field. However, Examiner has indicated that Ozcelik teaches "a controller for writing a second portion of *the progressive frame* in the memory, while the display engine displays the first portion, ie. top field is displayed." Note that the progressive frame is not a field, and the top field and bottom field are different fields. Accordingly, Ozcelik does not teach "writing a second portion of the field in the memory, while

the display engine displays the first portion of the field".

Accordingly, Assignee respectfully requests that the rejection to claim 18 and dependent claims 19-23.

CONCLUSION

For at least the foregoing reasons, Assignee respectfully requests pre-appeal review of the rejections of claims 1-14, and 16-23.

Dated: October 21, 2008

Respectfully submitted,



Mirut Dalal
Reg. No. 44,052
Attorney for Applicants

McAndrews, Held & Malloy, Ltd.
500 West Madison Street
Chicago, Illinois 60661

Telephone: (312) 775-8000
Facsimile: (312) 775-8100